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8.	BEFORE THE
9	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS
10	STATE OF CALIFORNIA
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12	In the Matter of the Accusation Against: Case No. 2011-458
13	SUZANNE FAULKNER, a.k.a. SUZANNE
	MARIE FAULKNER, a.k.a. SUZANNE MARIE MOORE, a.k.a. SUZANNE ACCUSATION
14	MARIE WELLS P.O. Box 1854
15	Pittsboro, NC 27312 Registered Nurse License No. 531921
16	
17	Respondent.
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19	Complainant alleges:
20	PARTIES
21	1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
22	official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
23	of Consumer Affairs.
	1 Decision of Norman
24	11
25	License Number 531921 to Suzanne Faulkner, also known as Suzanne Marie Faulkner, also
26	known as Suzanne Marie Moore, also known as Suzanne Marie Wells (Respondent). The
27	Registered Nurse License was in full force and effect at all times relevant to the charges brought
28	in this Accusation and will expire on January 31, 2011, unless renewed.
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JURISDICTION

- 3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.
- 4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subsection (b), of the Code, the Board may renew an expired license at any time within eight years after the expiration.
- 6. Section 118, subsection (b), of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY PROVISIONS

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- "(a) Unprofessional conduct, which includes, but is not limited to, the following:
- "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

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COST RECOVERY

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Out of State Discipline) (Bus. & Prof. Code §2761(a)(4))

Respondent has subjected her registered nurse license to disciplinary action under 9. Code section 2761, subsection (a)(4), in that on or about September 11, 2008, in a disciplinary action before the North Carolina Board of Registered Nursing (North Carolina Board), the North Carolina Board entered a Settlement Order, placing Respondent's registered nurse license on probation for one year. The conditions of Respondent's probation required her to: (1) comply with the North Carolina Board's probation program; (2) notify the North Carolina Board, in writing, within five days of any change of address or employer, including new employment, probation, suspension, termination and/or resignation from employment; (3) submit quarterly written performance reports from all employers where Respondent must have worked for three consecutive months, in the same facility, for an average of 64 hours-per-month; (4) perform duties in a safe and competent manner to the satisfaction of the North Carolina Board; (5) notify the North Carolina Board, in writing, within five days of any driving under the influence, misdemeanor, or felony charges, and notify the North Carolina Board of the outcome of any such charges within three days of the final disposition; (6) appear in person at interviews and meetings as directed by the North Carolina Board; (7) complete all conditions of the probationary license within 24 months; (8) work for at least six months under the direction of an on-site registered nurse; (9) not work for a nurse staffing agency, home health agency, on private duty, or for home hospice for six months; and (10) within three months of entry of the Settlement Order, complete a Board-approved ethical legal decision making course.

10. The underlying conduct supporting the North Carolina Board's disciplinary action is that while employed at Moses Cone Health System in Greensboro, North Carolina in or about 2007 and 2008, Respondent falsified information in a patient's medical record and exceeded her scope of practice as a licensed nurse.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 531921, issued to Suzanne Faulkner, also known as Suzanne Marie Faulkner, also known as Suzanne Marie Wells;
- 2. Ordering Suzanne Faulkner, a.k.a. Suzanne Marie Faulkner, a.k.a. Suzanne Marie Moore, a.k.a. Suzanne Marie Wells to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
 - Taking such other and further action as deemed necessary and proper.

DATED: Movember 15, 2010

LOUISE R. BAILEY, M.ED., RN Interim Executive Officer

Board of Registered Nursing
Department of Consumer Affairs

State of California

Complainant

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